

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

CRAIG FAULKNER
WENDY FORD
CRAIG FORD
SHARON COTE

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No. 1:12-cr-33-01/04-PB

INDICTMENT

The Grand Jury Charges:

COUNT ONE

**[Possession of an Unregistered Firearm]
[26 U.S.C. §§ 5861(d), 5841 and 5871]**

On or about March 2, 2011, in the District of New Hampshire, the defendant,

CRAIG FAULKNER

knowingly received and possessed a firearm, namely a W.M. Enders, Model Oak Leak, 16 gauge shotgun, serial number 106BT, such shotgun having an overall length of less than twenty six inches and a barrel length of less than eighteen inches, not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5861(d), 5841 and 5871.

The Grand Jury further charges:

COUNT TWO

**[Possession of a Firearm by a Convicted Felon]
[18 U.S.C. § 922 (g)(1)]**

On or about August 31, 2011, in the District of New Hampshire, the defendant

CRAIG FAULKNER

having been convicted on or about July 18, 2005 in the Hillsborough County (NH) Superior Court of Sale of a Controlled Drug, a felony punishable by a term of imprisonment exceeding one (1) year; did knowingly and intentionally possess a Walther, Model Sport Mark II, .22 caliber pistol, serial number 58435C, which had been shipped or transported in interstate commerce or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

The Grand Jury further charges:

COUNT THREE

**[Possession of a Firearm by a Convicted Felon]
[18 U.S.C. § 922 (g)(1)]**

On or about September 1, 2011, in the District of New Hampshire, the defendant

CRAIG FAULKNER

having been convicted on or about July 18, 2005 in the Hillsborough County (NH) Superior Court of Sale of a Controlled Drug, a felony punishable by a term of imprisonment exceeding one (1) year; did knowingly and intentionally possess a Llama, .380 caliber pistol, serial number A52800, which had been shipped or transported in interstate commerce or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

The Grand Jury further charges:

COUNT FOUR

[Distribution of a Controlled Substance - 21 U.S.C. § 841(a)(1)]

[Aiding and Abetting — 18 U.S.C. § 2]

On or about February 3, 2011, in the District of New Hampshire, the defendants,

**WENDY FORD, and
SHARON COTE**

did knowingly, intentionally and unlawfully distribute and aid and abet each other in the distribution of a quantity of cocaine base “crack”, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 18 United States Code, Section 2.

The Grand Jury further charges:

COUNT FIVE

[Distribution of a Controlled Substance - 21 U.S.C. § 841(a)(1)]

On or about February 8, 2011, in the District of New Hampshire, the defendant,

WENDY FORD

did knowingly, intentionally and unlawfully distribute a quantity of cocaine base “crack”, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The Grand Jury further charges:

COUNT SIX

[Distribution of a Controlled Substance - 21 U.S.C. § 841(a)(1)]

On or about February 16, 2011, in the District of New Hampshire, the defendant,

WENDY FORD

did knowingly, intentionally and unlawfully distribute a quantity of cocaine base “crack”, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The Grand Jury further charges:

COUNT SEVEN

[Distribution of a Controlled Substance - 21 U.S.C. § 841(a)(1)]

On or about February 22, 2011, in the District of New Hampshire, the defendants,

WENDY FORD

did knowingly, intentionally and unlawfully distribute a quantity of Oxycodone, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The Grand Jury further charges:

COUNT EIGHT

[Distribution of a Controlled Substance - 21 U.S.C. § 841(a)(1)]

On or about February 24, 2011, in the District of New Hampshire, the defendant,

WENDY FORD

did knowingly, intentionally and unlawfully distribute a quantity of cocaine base “crack”, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The Grand Jury further charges:

COUNT NINE

[Distribution of a Controlled Substance - 21 U.S.C. § 841(a)(1)]
[Aiding and Abetting — 18 U.S.C. § 2]

On or about March 16, 2011, in the District of New Hampshire, the defendants,

CRAIG FAULKNER
WENDY FORD, and
CRAIG FORD

did knowingly, intentionally and unlawfully distribute and aid and abet each other in the distribution of a quantity of Oxycodone, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 18 United States Code, Section 2.

The Grand Jury further charges:

COUNT TEN

[Distribution of a Controlled Substance - 21 U.S.C. § 841(a)(1)]

On or about April 12, 2011, in the District of New Hampshire, the defendant,

CRAIG FORD

did knowingly, intentionally and unlawfully distribute a quantity of Oxycodone, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The Grand Jury further charges:

COUNT ELEVEN

[Distribution of a Controlled Substance - 21 U.S.C. § 841(a)(1)]

On or about October 25, 2011, in the District of New Hampshire, the defendant,

CRAIG FORD

did knowingly, intentionally and unlawfully distribute a quantity of cocaine base (“crack”), a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The Grand Jury further charges:

COUNT TWELVE

[Distribution of a Controlled Substance - 21 U.S.C. § 841(a)(1)]

On or about November 9, 2011, in the District of New Hampshire, the defendant,

WENDY FORD

did knowingly, intentionally and unlawfully distribute a quantity of cocaine base “crack”, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The Grand Jury further charges:

COUNT THIRTEEN

[Distribution of a Controlled Substance - 21 U.S.C. § 841(a)(1)]

On or about November 22, 2011, in the District of New Hampshire, the defendant,

WENDY FORD

did knowingly, intentionally and unlawfully distribute a quantity of cocaine base “crack”, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The Grand Jury further charges:

COUNT FOURTEEN

[Distribution of a Controlled Substance - 21 U.S.C. § 841(a)(1)]

On or about December 2, 2011, in the District of New Hampshire, the defendant,

WENDY FORD

did knowingly, intentionally and unlawfully distribute a quantity of cocaine base “crack”, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

NOTICE OF CRIMINAL FIREARMS FORFEITURE

PURSUANT TO 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)

The allegations of Counts Two and Three of this Indictment are hereby re-alleged as if fully set forth herein and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. 924(d). Upon conviction of one or more of the offenses alleged in Counts Two and Three of this Indictment, defendant CRAIG FAULKNER shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in the commission of the offenses, including but not limited to the firearms listed above in Counts Two and Three.

All in violation of Title 18 U.S.C. § 924(d); and 28 U.S.C. § 2461(c).

A TRUE BILL

/s/ Foreperson

Grand Jury Foreperson

JOHN P. KACAVAS

United States Attorney

Dated: March 7, 2012

/s/ Jennifer C. Davis

Jennifer C. Davis

Assistant U.S. Attorney